UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

)	
UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 21-cr-10104-PBS
)	
VLADISLAV KLYUSHIN)	
Defend	dant)	
)	

ASSENTED-TO MOTION FOR LEAVE TO FILE A RESPONSE TO THE GOVERNMENT'S OPPOSITION TO DEFENDANT'S MOTION TO ACQUIT FOR IMPROPER VENUE ON OR BEFORE APRIL 10, 2023

Now comes the Defendant Vladislav Klyushin, by and through undersigned counsel, and hereby respectfully requests leave to file a response to the Government's Opposition to Defendant's Motion to Acquit for Improper Venue, Dkt. 225, on or before April 10, 2023. As grounds and reasons therefore, the defense states that the defense seeks to address legal and factual issues that were raised by the Government's brief that could not have been reasonably anticipated by the defense.

WHEREFORE, the defense respectfully requests this Honorable Court to grant its request.

COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

The undersigned counsel has conferred with the Government, who by and through AUSA Seth Kosto, assent to this request.

Respectfully Submitted, Vladislav Klyushin, By His Attorney,

/s/ Maksim Nemtsev

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Dated: April 3, 2023

CERTIFICATE OF SERVICE

I, Maksim Nemtsev, hereby certify that on this date, April 3, 2023, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

<u>/s/ Maksim Nemtsev</u> Maksim Nemtsev, Esq.